

**Lewis R. Landau** (CA Bar No. 143391)  
**Attorney-at-Law**  
22287 Mulholland Hwy., # 318  
Calabasas, California 91302  
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**5** Attorney for Platinum Loan Servicing, Inc.

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

In re Case No.: 20-50628 SLJ 11  
FRE 355 Investment Group, LLC, Cases Jointly Administered  
Debtor Chapter 11

## **RESPONSE IN OPPOSITION TO OBJECTION TO CLAIM**

In re  
Mora House, LLC,  
Debtor.

Date: October 7, 2020  
Time: 2:00 p.m.  
Place: Courtroom 9 (Telephonic)  
US Bankruptcy Court; Judge Johnson  
280 South First Street  
San Jose, California 95113

Platinum Loan Servicing, Inc. (“PLS”) as servicing agent for the beneficiaries of the mortgages on the real property owned by FRE 355 dba FRE 355 Investment Group, LLC (“FRE 355”) and Mora House, LLC (“Mora House”) (FRE 355 and Mora House are collectively referred to as “Debtors”), herein files its response in opposition to the Objections to Claims of Platinum Loan Servicing [ECF # 91] (“Objections”) filed by Debtors on September 1, 2020. For all these reasons, the Court should overrule and deny the Objections.

## **MEMORANDUM OF POINTS AND AUTHORITIES**

I.

### **THE OBJECTIONS ARE MERITLESS**

**AND SHOULD BE OVERRULED**

The Debtors' Objections are primarily based on confusion over PLS's accounting descriptions for the various charges accrued on the account. To clarify the accruals on PLS's loan, PLS has reformatted its beneficiary demand to eliminate the alleged confusion. The revised demand is attached hereto as Exhibit 1 and is incorporated herein by reference.

As set forth in Exhibit 1, the following are the components of PLS's claim as updated through October 1, 2020:

- 11 1. Undisputed principal balance: **\$10,937,000**. Debtors paid the loan through 6/30/19,  
12 although default interest based on defaulted payments that commenced on 2/1/19;  
13 2. 10% interest 8/1/19 to 9/22/20: **\$1,303,154.67**. Interest is paid in arrears, so the 8/1/19  
14 date includes interest accruing in July 2019 after the last payment;  
15 3. Late charges 10% on installments due 12/1/18 to 9/1/20: **\$200,511.74**;  
16 4. Default interest + 5% 2/1/19 to 9/1/20: **\$820,274.94**;  
17 5. Additional late fees on default interest: **\$86,584.52**;  
18 6. Misc. charges foreclosure trustee and attorney's fees: **\$103,282.69**.

There is nothing incorrect or “overlapping” (as alleged in the Objection) about the foregoing accruals.

Debtors also complain that the miscellaneous charges are not documented. Attached hereto as Exhibits 2 and 3 are true and correct copies of documents evidencing the foreclosure trustee fees and redacted attorney fee billings.

For all these reasons, the Objections are meritless and should be overruled and denied.

Dated: September 22, 2020

**Lewis R. Landau  
Attorney-at-Law**

By:/s/ Lewis R. Landau  
Lewis R. Landau  
Attorneys for Movant

# **DECLARATION OF SCOT FINE**

I, Scot Fine, do hereby declare:

1. I am the Chief Executive Officer of Platinum Loan Servicing, Inc. ("PLS") and have personal knowledge of the facts set forth herein.

2. PLS is the contractual loan servicer for S & R Income Fund I, LP as to an undivided 40.569% interest and S & R Income Fund II, LP as to an undivided 22.401% interest and RDG Lender Services, LLC, as to an undivided 9.600% interest and PLC Investment Group, LLC, a California limited liability company as to an undivided 9.143% interest and Julian Maimin and Stacey Maimin, Trustees, of the Julian Maimin & Stacey Maimin Revocable Trust U/A 12/1/10 as to an undivided 6.857% interest and Judi Beth Kaplan, Trustee of the Judi Beth Kaplan Living Trust dated November 29, 2006 as to an undivided 4.572% interest and William H. Scripps and Kathryn A. Scripps Trustees, of the Scripps Family 1992 Revocable Trust U/A 6-9-92 as to an undivided 4.572% interest and Lauren Dromy, Trustee, of The Israel Maimin 2010 Granter Trust FBO Lauren Dromy U/A 12/1/10 as to an undivided 2.286% interest (hereinafter "Lenders") under the March 29, 2018 Note Secured by Deed of Trust executed by FRE 355, LLC ("Note"). The Note is secured by a first priority deed of trust on the FRE 355 real property and a second priority deed of trust on the Mora House real property.

3. I am readily familiar with PLS's books and records for servicing the Note. The total amount due on the Lenders' loan as of October 1, 2020 is **\$13,450,808.56** as accurately set forth in the revised beneficiary demand a true and correct copy of which is attached hereto as Exhibit 1. The following accurately states the amounts accruing and due for the subject time periods:

- a. Undisputed principal balance: **\$10,937,000**. Debtors paid the loan through 6/30/19, although default interest based on defaulted payments that commenced on 2/1/19;
  - b. 10% interest 8/1/19 to 9/22/20: **\$1,303,154.67**. Interest is paid in arrears, so the 8/1/19 date includes interest accruing in July 2019 after the last payment;
  - c. Late charges 10% on installments due 12/1/18 to 9/1/20: **\$200,511.74**;
  - d. Default interest + 5% 2/1/19 to 9/1/20: **\$820,274.94**;

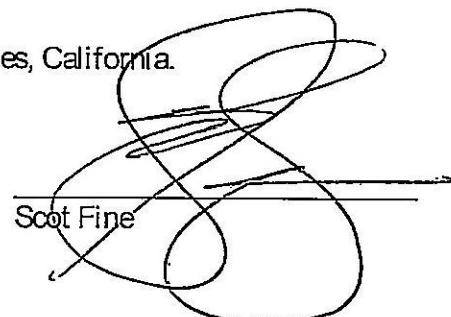
1                   e. Additional late fees on default interest: \$86,584.52;

2                   f. Misc. charges foreclosure trustee and attorney's fees: \$103,282.69.

3                  4. Attached hereto as Exhibits 2 and 3 and incorporated herein by reference are true  
4 and correct copies of documents evidencing the foreclosure trustee fees and redacted attorney fee  
5 billings charged to the Note account. In my experience, these are reasonable collection costs for a  
6 loan of this magnitude.

7                  I declare under penalty of perjury under the laws of the United States of America that the  
8 foregoing is true and correct.

9                  Executed this 1<sup>st</sup> day of October 2020 at Los Angeles, California.

A handwritten signature in black ink, appearing to read "Scott Fine". The signature is somewhat stylized and includes a horizontal line underneath it.

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# **EXHIBIT 1**

**Platinum Loan Servicing Inc.**  
24025 Park Sorrento Suite 150  
Calabasas, CA 91302  
(818) 222-5222

10/1/2020

FRE 355 Investment Group, LLC by: Melvin Vaughn, Managing Member  
10700 Mora Drive  
Los Altos, CA 94024  
Account: 10536

**BENEFICIARY'S DEMAND FOR PAYOFF**

Dear FRE 355 Investment Group, LLC by: Melvin Vaughn, Managing Member

You are authorized to use the following amounts to payoff the above-mentioned loan. All necessary legal documents will be forwarded to the trustee for Full Reconveyance upon receipt of payment in full.

Payoff Date	10/1/2020
Maturity Date	5/1/2019
Next Payment Due	9/1/2019
Interest Rate	10.000%
Interest Paid-To Date	8/1/2019
Principal Balance	\$10,937,000.00
Unpaid Interest	\$0.00
Accrued Interest From 8/1/2019 To 10/1/2020	\$1,303,154.67
Unpaid Late Charges (See Attachment)	\$200,511.74
Unpaid Charges (See itemization attached)	\$0.00
Prepayment Penalty	\$0.00
Other Fees (See itemization attached)	\$45.00
Trust Balance	\$0.00
<b>Payoff Amount</b>	<b>\$13,450,808.56</b>

Please add \$3,038.06 for each additional day past 10/1/2020.

We reserve the right to amend this demand should any changes occur that would increase the total amount for payoff. Please note that this demand expires on 10/2/2020, at which time you are instructed to contact this office for additional instructions (DEMAND FORWARDING FEES ARE DUE EVEN UPON CANCELLATION OF YOUR ESCROW).

Make disbursement check payable to: **Platinum Loan Servicing Inc.**

Sincerely,

Karen Larson  
Platinum Loan Servicing, Inc.  
818 222-5222  
klarson@platinumloanservicing.com

Approved By: Larry Rabinoff CFO

## **ITEMIZATION OF UNPAID CHARGES**

**ITEMIZATION OF UNPAID CHARGES**

Date	Description	Interest Rate	Unpaid Balance	Accrued Interest	Total Due
02/14/2019	NSF Payment Charges	0.000%	\$25.00	\$0.00	\$25.00
03/01/2019	Defulted Interest Rate of 5% 2-1-19 - 9-1-20	0.000%	\$820,274.94	\$0.00	\$820,274.94
03/01/2019	Default Late Charges 5% 2-1-19 - 9-1-20	0.000%	\$86,584.52	\$0.00	\$86,584.52
04/15/2019	Advanced Trustee Fees	0.000%	\$17,538.34	\$0.00	\$17,538.34
04/15/2019	Advanced Trustee Fees	0.000%	\$5,062.91	\$0.00	\$5,062.91
02/14/2020	Advanced Trustee Fees	0.000%	\$426.87	\$0.00	\$426.87
02/14/2020	Advanced Trustee Fees	0.000%	\$1,790.35	\$0.00	\$1,790.35
02/14/2020	Advanced Trustee Fees	0.000%	\$1,705.12	\$0.00	\$1,705.12
02/14/2020	Advanced Trustee Fees	0.000%	\$4,177.69	\$0.00	\$4,177.69
02/14/2020	Advanced Trustee Fees	0.000%	\$14,471.84	\$0.00	\$14,471.84
02/14/2020	Advanced Trustee Fees	0.000%	\$852.48	\$0.00	\$852.48
07/06/2020	Advanced Appraisal Fees	0.000%	\$10,500.00	\$0.00	\$10,500.00
07/08/2020	Advanced Lawyer Fees	0.000%	\$1,564.00	\$0.00	\$1,564.00
07/15/2020	SBS Trust Deed Fees (Vacant Land)	0.000%	\$8,028.69	\$0.00	\$8,028.69
07/15/2020	Advanced Lawyer Fees	0.000%	\$6,000.00	\$0.00	\$6,000.00
07/16/2020	Advanced Lawyer Fees	0.000%	\$22,067.00	\$0.00	\$22,067.00
08/11/2020	Advanced Lawyer Fees	0.000%	\$9,891.00	\$0.00	\$9,891.00
09/22/2020	SBS Over Payment of Trutee Fees	0.000%	(\$1,501.60)	\$0.00	(\$1,501.60)
09/23/2020	Advanced Lawyer Fees	0.000%	\$683.00	\$0.00	\$683.00
				<b>Total</b>	<b>\$1,010,142.15</b>

**ITEMIZATION OF OTHER FEES**

Description	Amount
Demand Fee	\$0.00
Reconveyance Fee	\$45.00
Recording Fee	\$0.00
Forwarding Fee	\$0.00
<b>Total</b>	<b>\$45.00</b>

## **EXHIBIT 2**



## INVOICE

Date: January 10, 2020

PLATINUM LOAN SERVICING, INC.  
Attn: KAREN LARSON  
24025 PARK SORRENTO #150  
CALABASAS, CA 91302

Tax ID #: 95-3783564  
T.S. No: 2019-1305  
Loan No: 10536 (A)

Borrower: FRE 355, LLC DBA FRE 355 INVESTMENT GROUP, LLC  
Property Address: 10718 MORA DRIVE  
LOS ALTOS, CA 94024  
Invoice Number: 21396

Date	Description of Fees and Costs	Amount
03/14/2019	Trustee's Fees	\$14,721.25
03/15/2019	Additional Mail Cost (F)	\$30.00
03/15/2019	Mailings (10 Day)	\$210.00
03/15/2019	Record Notice of Default	\$34.00
03/15/2019	Record Notice of Default (Surcharge Gov Code 27388.1)	\$75.00
03/15/2019	Record Notice of Rescission	\$34.00
03/15/2019	Record Notice of Rescission (Surcharge Gov Code 27388.1)	\$75.00
03/15/2019	Record Substitution of Trustee	\$31.00
03/15/2019	Record Substitution of Trustee (Surcharge Gov Code 27388.1)	\$75.00
03/15/2019	T.S.G. Cost	\$7,256.00
03/20/2019	Mailings (10 Day)	\$60.00
03/28/2019	Mailings (30 Day)	\$20.00
04/02/2019	Mailings (30 Day)	\$130.00
04/16/2019	Additional Mail Cost (F)	\$30.00
06/25/2019	Additional Mail Cost (F)	\$30.00
06/25/2019	Mailings (Notice of Sale)	\$420.00
06/25/2019	Mailings (Notice to Resident)	\$10.00
06/25/2019	Posting of Notice of Sale	\$125.00
06/25/2019	Publication of Notice of Sale	\$1,047.50
06/25/2019	Record Notice of Sale	\$28.00
06/25/2019	Record Notice of Sale (Surcharge Gov Code 27388.1)	\$75.00
06/25/2019	Trustee's Fees	\$14,531.25
07/30/2019	Postponement Cost	\$25.00
08/06/2019	Postponement Cost	\$25.00
08/07/2019	Mailings (Sale Postponement Letter)	\$400.00
08/07/2019	Postponement Cost	\$25.00

31194 La Baya Drive, Suite 106, Westlake Village, CA 91362  
818.991.4600 Fax 818.874.9500 e-mail: [info@sbstrustdeed.com](mailto:info@sbstrustdeed.com)  
<http://www.sbstrustdeed.com>

S.B.S. is a debt collector attempting to collect a debt and any information will be used for that purpose.



S.B.S. TRUST DEED NETWORK  
SIMPLY BETTER SERVICE

09/05/2019	Mailings (Sale Postponement Letter)	\$400.00
09/05/2019	Postponement Cost	\$25.00
10/04/2019	Mailings (Sale Postponement Letter)	\$400.00
10/04/2019	Postponement Cost	\$25.00
11/04/2019	Mailings (Sale Postponement Letter)	\$400.00
11/04/2019	Postponement Cost	\$25.00
12/06/2019	Mailings (Sale Postponement Letter)	\$400.00
12/06/2019	Postponement Cost	\$25.00
01/10/2020	Postponement Cost	\$25.00
01/10/2020	Trustee's Fees	\$2.78

<b>SubTotal</b>	<b>\$41,250.78</b>
04/18/2019	Deposit
	\$22,601.25
<b>Total Due</b>	<b>\$18,649.53</b>

THE AMOUNT SHOWN IS DUE AND PAYABLE UPON RECEIPT.  
PLEASE REMIT PAYMENT TO S.B.S. Trust Deed Network. YOU ARE A VALUED  
CUSTOMER AND WE APPRECIATE YOUR CONTINUED PATRONAGE.

2 Advances In Upfront  
Charges

SEE 1 + 2

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## INVOICE

Date: July 14, 2020

PLATINUM LOAN SERVICING, INC.  
Attn: KAREN LARSON  
24025 PARK SORRENTO #150  
CALABASAS, CA 91302

Tax ID #: 95-3783564  
T.S. No: 2019-1305  
Loan No: 10536 (A)

Borrower: **FRE 355, LLC DBA FRE 355 INVESTMENT GROUP, LLC**  
Property Address: **10718 MORA DRIVE**  
**LOS ALTOS, CA 94024**  
Invoice Number: **23381**

<b>Date</b>	<b>Description of Fees and Costs</b>	<b>Amount</b>
03/14/2019	Trustee's Fees	\$14,721.25
03/15/2019	Additional Mail Cost (F)	\$30.00
03/15/2019	Mailings (10 Day)	\$210.00
03/15/2019	Record Notice of Default	\$34.00
03/15/2019	Record Notice of Default (Surcharge Gov Code 27388.1)	\$75.00
03/15/2019	Record Notice of Rescission	\$34.00
03/15/2019	Record Notice of Rescission (Surcharge Gov Code 27388.1)	\$75.00
03/15/2019	Record Substitution of Trustee	\$31.00
03/15/2019	Record Substitution of Trustee (Surcharge Gov Code 27388.1)	\$75.00
03/15/2019	T.S.G. Cost	\$7,256.00
03/20/2019	Mailings (10 Day)	\$60.00
03/28/2019	Mailings (30 Day)	\$20.00
04/02/2019	Mailings (30 Day)	\$130.00
04/16/2019	Additional Mail Cost (F)	\$30.00
06/25/2019	Additional Mail Cost (F)	\$30.00
06/25/2019	Mailings (Notice of Sale)	\$420.00
06/25/2019	Mailings (Notice to Resident)	\$10.00
06/25/2019	Posting of Notice of Sale	\$125.00
06/25/2019	Publication of Notice of Sale	\$1,047.50
06/25/2019	Record Notice of Sale	\$28.00
06/25/2019	Record Notice of Sale (Surcharge Gov Code 27388.1)	\$75.00
06/25/2019	Trustee's Fees	\$14,531.25
07/30/2019	Postponement Cost	\$25.00
08/06/2019	Postponement Cost	\$25.00
08/07/2019	Mailings (Sale Postponement Letter)	\$400.00
08/07/2019	Postponement Cost	\$25.00

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09/05/2019	Mailings (Sale Postponement Letter)	\$400.00
09/05/2019	Postponement Cost	\$25.00
10/04/2019	Mailings (Sale Postponement Letter)	\$400.00
10/04/2019	Postponement Cost	\$25.00
11/04/2019	Mailings (Sale Postponement Letter)	\$400.00
11/04/2019	Postponement Cost	\$25.00
12/06/2019	Mailings (Sale Postponement Letter)	\$400.00
12/06/2019	Postponement Cost	\$25.00
01/10/2020	Postponement Cost	\$25.00
01/10/2020	Trustee's Fees	\$2.78
01/14/2020	Mailings (Sale Postponement Letter)	\$400.00
01/14/2020	Postponement Cost	\$25.00
01/16/2020	Postponement Cost	\$25.00
02/12/2020	Postponement Cost	\$25.00
02/20/2020	Postponement Cost	\$25.00
02/28/2020	Mailings (Sale Postponement Letter)	\$400.00
02/28/2020	Postponement Cost	\$25.00
03/20/2020	Postponement Cost	\$25.00
04/03/2020	Postponement Cost	\$25.00
04/13/2020	Mailings (Notice of Sale)	\$10.00
04/13/2020	Mailings (Sale Postponement Letter)	\$420.00
04/13/2020	Postponement Cost	\$25.00
04/13/2020	Record Notice of Rescission	- \$109.00
04/13/2020	Record Trustee's Deed Upon Sale	\$50.00
04/13/2020	Record Trustee's Deed Upon Sale (Surcharge Gov Code 27388.1)	\$75.00
04/13/2020	Trustee's Fees	- \$2.78
04/27/2020	Mailings (Sale Postponement Letter)	\$420.00
04/27/2020	Postponement Cost	\$25.00
05/07/2020	Mailings (Sale Postponement Letter)	\$420.00
05/07/2020	Postponement Cost	\$25.00
05/27/2020	Postponement Cost	\$25.00
06/02/2020	Postponement Cost	\$25.00
06/09/2020	Mailings (Sale Postponement Letter)	\$420.00
06/09/2020	Postponement Cost	\$25.00
07/07/2020	Mailings (Sale Postponement Letter)	\$420.00
07/07/2020	Postponement Cost	\$25.00

<b>SubTotal</b>	<b>\$44,524.00</b>
04/18/2019	Deposit -
02/11/2020	Deposit <i>\$22,601.25</i> -

*\$23,424.35*

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*IN Unpaid Charges: Advances  
 # 3 - # 8*



Total Due

(\$1,501.60)

#10

THE AMOUNT SHOWN IS DUE AND PAYABLE UPON RECEIPT.  
PLEASE REMIT PAYMENT TO **S.B.S. Trust Deed Network**. YOU ARE A VALUED  
CUSTOMER AND WE APPRECIATE YOUR CONTINUED PATRONAGE.

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## INVOICE

Date: July 14, 2020

PLATINUM LOAN SERVICING, INC.  
Attn: KAREN LARSON  
24025 PARK SORRENTO #150  
CALABASAS, CA 91302

Tax ID #: 95-3783564  
T.S. No: 2019-1358  
Loan No: 10536 (B)

Borrower: **MORA HOUSE, LLC**  
Property Address: **VACANT LAND, LOS ALTOS, CA 94024**  
**APN: 331-14-067**  
Invoice Number: **23380**

Date	Description of Fees and Costs	Amount
04/02/2019	Trustee's Fees	\$14,721.25
04/04/2019	Additional Mail Cost (F)	\$30.00
04/04/2019	Mailings (10 Day)	\$370.00
04/04/2019	Posting of Notice of Default	\$75.00
04/04/2019	Record Notice of Default	\$34.00
04/04/2019	Record Notice of Default (Surcharge Gov Code 27388.1)	\$75.00
04/04/2019	Record Notice of Rescission	\$34.00
04/04/2019	Record Notice of Rescission (Surcharge Gov Code 27388.1)	\$75.00
04/04/2019	Record Substitution of Trustee	\$29.00
04/04/2019	Record Substitution of Trustee (Surcharge Gov Code 27388.1)	\$75.00
04/04/2019	T.S.G. Cost	\$7,256.00
04/04/2019	Trustee's Fee Adjustment (Cap file at \$500.00)	-
		\$14,221.25
04/16/2019	Additional Mail Cost (F)	\$30.00
04/16/2019	Mailings (30 Day)	\$10.00
07/17/2019	Additional Mail Cost (F)	\$30.00
07/17/2019	Mailings (Notice of Sale)	\$380.00
07/17/2019	Mailings (Notice to Resident)	\$10.00
07/17/2019	Posting of Notice of Sale	\$125.00
07/17/2019	Publication of Notice of Sale	\$2,259.69
07/17/2019	Record Notice of Sale	\$34.00
07/17/2019	Record Notice of Sale (Surcharge Gov Code 27388.1)	\$75.00
07/17/2019	Trustee's Fee Adjustment (Cap at \$500.00)	-
		\$94,648.75
07/17/2019	Trustee's Fees	\$94,648.75
08/08/2019	Mailings (Sale Postponement Letter)	\$380.00

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**S.B.S. TRUST DEED NETWORK**  
SIMPLY BETTER SERVICE

08/08/2019	Postponement Cost	\$25.00
08/08/2019	Trustee's Fees	\$
08/09/2019	Trustee's Fee Adjustment (Cap @ \$500.00)	\$80,117.50
09/05/2019	Mailings (Sale Postponement Letter)	\$380.00
09/05/2019	Postponement Cost	\$25.00
10/04/2019	Mailings (Sale Postponement Letter)	\$380.00
10/04/2019	Postponement Cost	\$25.00
11/04/2019	Mailings (Sale Postponement Letter)	\$380.00
11/04/2019	Postponement Cost	\$25.00
12/06/2019	Mailings (Sale Postponement Letter)	\$370.00
12/06/2019	Postponement Cost	\$25.00
01/14/2020	Mailings (Sale Postponement Letter)	\$370.00
01/14/2020	Postponement Cost	\$25.00
01/16/2020	Postponement Cost	\$25.00
02/19/2020	Mailings (Sale Postponement Letter)	\$10.00
02/19/2020	Postponement Cost	\$25.00
02/20/2020	Postponement Cost	\$25.00
02/28/2020	Mailings (Sale Postponement Letter)	\$370.00
02/28/2020	Postponement Cost	\$25.00
03/20/2020	Postponement Cost	\$25.00
04/03/2020	Postponement Cost	\$25.00
04/15/2020	Mailings (Sale Postponement Letter)	\$400.00
04/15/2020	Postponement Cost	\$25.00
04/27/2020	Mailings (Sale Postponement Letter)	\$400.00
04/27/2020	Postponement Cost	\$25.00
05/07/2020	Mailings (Sale Postponement Letter)	\$400.00
05/07/2020	Postponement Cost	\$25.00
05/27/2020	Postponement Cost	\$25.00
06/02/2020	Postponement Cost	\$25.00
06/09/2020	Mailings (Sale Postponement Letter)	\$400.00
06/09/2020	Postponement Cost	\$25.00
07/07/2020	Mailings (Sale Postponement Letter)	\$400.00
07/07/2020	Postponement Cost	\$25.00
<hr/>		
<b>SubTotal</b>		<b>\$16,621.69</b>
05/13/2019	Deposit	- \$8,593.00
<hr/>		
<b>Total Due</b>		<b>\$8,028.69</b>

THE AMOUNT SHOWN IS DUE AND PAYABLE UPON RECEIPT.  
PLEASE REMIT PAYMENT TO **S.B.S. Trust Deed Network**. YOU ARE A VALUED  
CUSTOMER AND WE APPRECIATE YOUR CONTINUED PATRONAGE.

*In Unpaid  
charges*

31194 La Baya Drive, Suite 106, Westlake Village, CA 91362  
818.991.4600 Fax 818.874.9500 e-mail: [info@sbstrustdeed.com](mailto:info@sbstrustdeed.com)

# 9

<http://www.sbstrustdeed.com>

S.B.S. is a debt collector attempting to collect a debt and any information will be used for that purpose

<p><b>FROM:</b></p> <p>James J. Nicholas &amp; Associates P.O. Box 7575 Menlo Park, CA 94026</p> <p>Telephone Number: (650) 324-7946      Fax Number:</p>	<p style="text-align: center;"><b>INVOICE</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="2"><b>INVOICE NUMBER</b></td> </tr> <tr> <td colspan="2">6-1020-3</td> </tr> <tr> <td colspan="2"><b>DATES</b></td> </tr> <tr> <td>Invoice Date:</td> <td>06/10/2020</td> </tr> <tr> <td>Due Date:</td> <td></td> </tr> <tr> <td colspan="2"><b>REFERENCE</b></td> </tr> <tr> <td>Internal Order #:</td> <td></td> </tr> <tr> <td>Lender Case #:</td> <td></td> </tr> <tr> <td>Client File #:</td> <td></td> </tr> <tr> <td>FHA/VA Case #:</td> <td></td> </tr> <tr> <td>Main File # on form:</td> <td>6-1020-3</td> </tr> <tr> <td>Other File # on form:</td> <td></td> </tr> <tr> <td>Federal Tax ID:</td> <td></td> </tr> <tr> <td>Employer ID:</td> <td></td> </tr> </table>	<b>INVOICE NUMBER</b>		6-1020-3		<b>DATES</b>		Invoice Date:	06/10/2020	Due Date:		<b>REFERENCE</b>		Internal Order #:		Lender Case #:		Client File #:		FHA/VA Case #:		Main File # on form:	6-1020-3	Other File # on form:		Federal Tax ID:		Employer ID:	
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<p><b>TO:</b></p> <p>Platinum Loan Servicing Inc. 24025 Park Sorrento #150 Calabasas, CA 91302 Attn: Scot R. Fine E-Mail: sfine@MarqueeFundingGroup.com Telephone Number: 1-818-222-5222      Fax Number: Alternate Number:</p>																													
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## **EXHIBIT 3**

**Lewis R. Landau**  
22287 Mulholland Hwy., # 318  
Calabasas, CA 91302

# INVOICE

**Platinum Loan Servicing, Inc.**

Invoice Date	Invoice Number
05/05/2020	20469
Terms	Service Through
	04/30/2020

<b>In Reference To: FRE 355 / Mora House (Labor)</b>				
Date	Services	Hours	Rates	Amount
04/13/2020		2.00	\$ 545.00/hr	\$ 1,090.00
04/14/2020		1.70	\$ 545.00/hr	\$ 926.50
04/15/2020		0.30	\$ 545.00/hr	\$ 163.50
04/16/2020		0.20	\$ 545.00/hr	\$ 109.00
04/17/2020		2.30	\$ 545.00/hr	\$ 1,253.50
04/18/2020		2.00	\$ 545.00/hr	\$ 1,090.00
04/19/2020		1.50	\$ 545.00/hr	\$ 817.50
04/20/2020		2.70	\$ 545.00/hr	\$ 1,471.50
04/22/2020		0.80	\$ 545.00/hr	\$ 436.00
04/23/2020		1.00	\$ 545.00/hr	\$ 545.00
04/27/2020		0.80	\$ 545.00/hr	\$ 436.00

04/28/2020		0.70	\$ 545.00/hr	\$ 381.50
04/29/2020		0.50	\$ 545.00/hr	\$ 272.50
04/30/2020		0.40	\$ 545.00/hr	\$ 218.00

**In Reference To: FRE 355 / Mora House (Expenses)**

Date	Expenses	Amount
04/20/2020	CA and DE SOS status reports CL@S fees (\$125); DE SOS fees (\$20).	\$ 145.00
04/23/2020	Courtcall fee re 4/23 hearing.	\$ 28.00

Total Hours	16.90 hrs
Total Labor	\$ 9,210.50
Total Expenses	\$ 173.00
Total Invoice Amount	\$ 9,383.50
Previous Balance	\$ 0.00
Balance (Amount Due)	\$ 9,383.50

**Lewis R. Landau**  
22287 Mulholland Hwy., # 318  
Calabasas, CA 91302

# INVOICE

**Platinum Loan Servicing, Inc.**

Invoice Date	Invoice Number
06/09/2020	20474
Terms	Service Through
	05/31/2020

**In Reference To: FRE 355 / Mora House (Labor)**

Date	Services	Hours	Rates	Amount
05/01/2020		0.50	\$ 545.00/hr	\$ 272.50
05/04/2020		2.00	\$ 545.00/hr	\$ 1,090.00
05/05/2020		3.00	\$ 545.00/hr	\$ 1,635.00
05/06/2020		0.30	\$ 545.00/hr	\$ 163.50
05/07/2020		0.70	\$ 545.00/hr	\$ 381.50
05/19/2020		1.00	\$ 545.00/hr	\$ 545.00
05/20/2020		2.50	\$ 545.00/hr	\$ 1,362.50
05/26/2020		1.00	\$ 545.00/hr	\$ 545.00
05/27/2020		2.60	\$ 545.00/hr	\$ 1,417.00
05/28/2020		0.30	\$ 545.00/hr	\$ 163.50
05/29/2020		0.20	\$ 545.00/hr	\$ 109.00

**In Reference To: FRE 355 / Mora House (Expenses)**

Date	Expenses	Amount
------	----------	--------

**Lewis R. Landau**  
22287 Mulholland Hwy., # 318  
Calabasas, CA 91302

# INVOICE

**Platinum Loan Servicing, Inc.**

Invoice Date	Invoice Number
07/08/2020	20477
Terms	Service Through
	06/30/2020

**In Reference To: FRE 355 / Mora House (Labor)**

Date	Services	Hours	Rates	Amount
06/01/2020		0.20	\$ 545.00/hr	\$ 109.00
06/02/2020		1.20	\$ 545.00/hr	\$ 654.00
06/04/2020		1.20	\$ 545.00/hr	\$ 654.00
06/05/2020		0.40	\$ 545.00/hr	\$ 218.00
06/09/2020		0.30	\$ 545.00/hr	\$ 163.50
06/10/2020		1.50	\$ 545.00/hr	\$ 817.50
06/17/2020		0.50	\$ 545.00/hr	\$ 272.50
06/22/2020		0.30	\$ 545.00/hr	\$ 163.50
06/24/2020		1.70	\$ 545.00/hr	\$ 926.50
06/25/2020		1.10	\$ 545.00/hr	\$ 599.50
06/26/2020		0.60	\$ 545.00/hr	\$ 327.00

**In Reference To: FRE 355 / Mora House (Expenses)**

Date	Expenses	Amount
06/04/2020	Courtcall fee re status hearing.	\$ 28.00

**Lewis R. Landau**  
22287 Mulholland Hwy., # 318  
Calabasas, CA 91302

# INVOICE

**Platinum Loan Servicing, Inc.**

Invoice Date	Invoice Number
08/03/2020	20489
Terms	Service Through
	07/31/2020

In Reference To: FRE 355 / Mora House (Labor)				
Date	Services	Hours	Rates	Amount
07/06/2020		1.60	\$ 545.00/hr	\$ 872.00
07/07/2020		3.00	\$ 545.00/hr	\$ 1,635.00
07/10/2020		1.00	\$ 545.00/hr	\$ 545.00
07/14/2020		1.00	\$ 545.00/hr	\$ 545.00
07/21/2020		3.00	\$ 545.00/hr	\$ 1,635.00
07/22/2020		2.40	\$ 545.00/hr	\$ 1,308.00
07/23/2020		0.20	\$ 545.00/hr	\$ 109.00
07/25/2020		1.00	\$ 545.00/hr	\$ 545.00
07/27/2020		2.00	\$ 545.00/hr	\$ 1,090.00
07/28/2020		2.00	\$ 545.00/hr	\$ 1,090.00

**In Reference To: FRE 355 / Mora House (Expenses)**

Date	Expenses	Amount
07/22/2020	COS fee re mailing and postage for motion to dismiss cases.	\$ 122.00
07/28/2020	Copy and mail service re motion for relief from stay.	\$ 214.00
07/28/2020	Relief from stay filing fee.	\$ 181.00

Total Hours	17.20 hrs
Total Labor	\$ 9,374.00
Total Expenses	\$ 517.00
Total Invoice Amount	<b>\$ 9,891.00</b>
Previous Balance	\$ 22,067.00
Balance (Amount Due)	<b>\$ 9,891.00</b>

**Payment History:**

Date	Type	Payment Description	Amount
7/20/2020	Payment - Check		(\$22,067.00)

**Lewis R. Landau**  
22287 Mulholland Hwy., # 318  
Calabasas, CA 91302

# INVOICE

**Platinum Loan Servicing, Inc.**

Invoice Date	Invoice Number
09/05/2020	20508
Terms	Service Through
	08/31/2020

<b>In Reference To: FRE 355 / Mora House (Labor)</b>			
Date	Services	Hours	Rates
08/03/2020		0.50	\$ 545.00/hr
08/05/2020		1.20	\$ 545.00/hr
08/10/2020		0.80	\$ 545.00/hr
08/11/2020		1.80	\$ 545.00/hr
08/12/2020		3.00	\$ 545.00/hr
08/14/2020		0.30	\$ 545.00/hr
08/17/2020		0.50	\$ 545.00/hr
08/27/2020		3.00	\$ 545.00/hr
08/31/2020		0.80	\$ 545.00/hr

Total Hours	11.90 hrs
Total Labor	\$ 6,485.50
Total Invoice Amount	\$ 6,485.50
Previous Balance	\$ 9,891.00

**CERTIFICATE OF SERVICE**

I am employed in the County of Los Angeles, California. I am over the age of eighteen (18) years and not a party to the within entitled cause, my business address is 22287 Mulholland Hwy., # 318, Calabasas, CA 91302.

On October 1, 2020 I served a true and correct copy of the following documents:

## 6 | RESPONSE IN OPPOSITION TO OBJECTION TO CLAIM

7 by effecting electronic delivery upon such persons that have agreed to accept service through the  
8 Court's CM/ECF electronic noticing system as follows:

9 Bernard S. Greenfield on behalf of Creditor Richard Blanchard  
bgreenfield@greenfieldlaw.com, ckaefer@greenfieldlaw.com

10 Robert G. Harris on behalf of Debtor FRE 355 Investment Group, LLC  
rob@bindermalter.com

11 Lewis R. Landau on behalf of Creditor Platinum Loan Servicing, Inc.  
lew@landaunet.com

12 Michael W. Malter on behalf of Debtor FRE 355 Investment Group, LLC  
michael@bindermalter.com

13 Office of the U.S. Trustee / SJ  
USTPRegion17.SJ.ECF@usdoj.gov

14 Suhey Ramirez on behalf of U.S. Trustee Office of the U.S. Trustee / SJ  
suhey.ramirez@usdoj.gov, Patti.Vargas@UST.DOJ.GOV

15 Julie H. Rome-Banks on behalf of Debtor FRE 355 Investment Group, LLC  
julie@bindermalter.com

16 Jennifer C. Wong on behalf of Creditor Wells Fargo Bank, N.A.  
bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

19 I declare under penalty of perjury under the laws of the United States of America that the  
20 foregoing is true and correct.

21 Executed this 1<sup>st</sup> day of October 2020 at Los Angeles, California.

/s/ Lewis R. Landau